

**From:** [Kyung S. Lee](#)  
**To:** [Ruff, Jayson B. \(USTP\)](#); [Nguyen, Ha \(USTP\)](#); [Melissa Haselden](#)  
**Cc:** [Marc Schwartz](#); [Christian Schwartz](#); [Harold Lee](#)  
**Subject:** [EXTERNAL] Re: InfoW, LLC et al. 22-60020 Deposition and Document Requests  
**Date:** Wednesday, May 18, 2022 3:55:00 PM  
**Attachments:** [image003.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)

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Sorry I was away filing so I missed the email. If I said it incorrectly in ¶ 22, I have no problem with your clarifying with the Court.

I am good having hearing tomorrow or Friday. Tomorrow obviously would be better for the Debtors so I don't have to stay up drafting answers all Thursday night. But I guess that is part of the job.

**Kyung S. Lee**  
**Kyung S. Lee PLLC**  
Cell: 713-301-4751  
[klee@kslpllc.com](mailto:klee@kslpllc.com)

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**From:** Ruff, Jayson B. (USTP) <[Jayson.B.Ruff@usdoj.gov](mailto:Jayson.B.Ruff@usdoj.gov)>  
**Date:** Wednesday, May 18, 2022 at 3:46 PM  
**To:** Kyung S. Lee <[klee@kslpllc.com](mailto:klee@kslpllc.com)>, Nguyen, Ha (USTP) <[Ha.Nguyen@usdoj.gov](mailto:Ha.Nguyen@usdoj.gov)>, Melissa Haselden <[mhaselden@haseldenfarrow.com](mailto:mhaselden@haseldenfarrow.com)>  
**Cc:** Marc Schwartz <[mschwartz@schwartzassociates.us](mailto:mschwartz@schwartzassociates.us)>, Christian Schwartz <[cschwartz@schwartzassociates.us](mailto:cschwartz@schwartzassociates.us)>, Harold Lee <[hlee@schwartzassociates.us](mailto:hlee@schwartzassociates.us)>  
**Subject:** RE: InfoW, LLC et al. 22-60020 Deposition and Document Requests

Kyung,

Understood. One small but important point of clarification. We do not necessarily "want" any continuance. We would not be in opposition a shorter continuance set forth in my email below.

Are you hoping to have this heard tomorrow or Friday? Let me know when you can.

Kind regards,

***Jayson B. Ruff***  
Trial Attorney  
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**From:** Kyung S. Lee <[klee@ksllpc.com](mailto:klee@ksllpc.com)>

**Sent:** Wednesday, May 18, 2022 3:37 PM

**To:** Ruff, Jayson B. (USTP) <[Jayson.B.Ruff@usdoj.gov](mailto:Jayson.B.Ruff@usdoj.gov)>; Nguyen, Ha (USTP) <[Ha.Nguyen@usdoj.gov](mailto:Ha.Nguyen@usdoj.gov)>; Melissa Haselden <[mhaselden@haseldenfarrow.com](mailto:mhaselden@haseldenfarrow.com)>

**Cc:** Marc Schwartz <[mschwartz@schwartzassociates.us](mailto:mschwartz@schwartzassociates.us)>; Christian Schwartz <[cschwartz@schwartzassociates.us](mailto:cschwartz@schwartzassociates.us)>; Harold Lee <[hlee@schwartzassociates.us](mailto:hlee@schwartzassociates.us)>

**Subject:** [EXTERNAL] Re: InfoW, LLC et al. 22-60020 Deposition and Document Requests

1. I am going to file my Motion for Continuance with the dates Marc and I need to do our jobs. I will state US Trustee wants a shorter continuance.
2. I am fine pushing the Proposed Trustee Motion out to the new date.
3. I am also fine pushing out the Bar Date Motion out to the new date.
4. I need to go forward and get Marc retained and approved as CRO. You should file objection and we should have a hearing on this matter so that it is cleared up.

Kyung S. Lee

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Cell: 713-301-4751

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**From:** Ruff, Jayson B. (USTP) <[Jayson.B.Ruff@usdoj.gov](mailto:Jayson.B.Ruff@usdoj.gov)>

**Date:** Wednesday, May 18, 2022 at 3:28 PM

**To:** Kyung S. Lee <[klee@ksllpc.com](mailto:klee@ksllpc.com)>, Nguyen, Ha (USTP) <[Ha.Nguyen@usdoj.gov](mailto:Ha.Nguyen@usdoj.gov)>, Melissa Haselden <[mhaselden@haseldenfarrow.com](mailto:mhaselden@haseldenfarrow.com)>

**Cc:** Marc Schwartz <[mschwartz@schwartzassociates.us](mailto:mschwartz@schwartzassociates.us)>, Christian Schwartz <[cschwartz@schwartzassociates.us](mailto:cschwartz@schwartzassociates.us)>, Harold Lee <[hlee@schwartzassociates.us](mailto:hlee@schwartzassociates.us)>

**Subject:** RE: InfoW, LLC et al. 22-60020 Deposition and Document Requests

Kyung,

The UST does not oppose a short extension, but would only be supportive of extending for approximately two weeks to somewhere around June 10th (depending on the Court's availability). Assuming the hearing is pushed, we can also push the discovery dates out to a

later agreed time approximately a week before the reset hearing along with the answer date. Reply and Exhibit date can be two business days prior to the reset hearing.

Assuming everything is pushed out, if Debtors are able to provide us with the documents we are seeking in our request prior to the 341, then we will try to use that time to question Marc with respect to those documents and perhaps reduce what is needed to be covered at the deposition. We understand that may not be possible, but I just want to put that possibility out there.

As a part of our agreement to support pushing the hearing on dismissal, I would also need all other motions to be pushed to the same date to be heard immediately following the dismissal motion (including the CRO motion).

Please let me know your thoughts.

Kind regards,

***Jayson B. Ruff***

Trial Attorney

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**From:** Kyung S. Lee <[klee@kslpplc.com](mailto:klee@kslpplc.com)>

**Sent:** Wednesday, May 18, 2022 11:01 AM

**To:** Ruff, Jayson B. (USTP) <[Jayson.B.Ruff@usdoj.gov](mailto:Jayson.B.Ruff@usdoj.gov)>; Nguyen, Ha (USTP) <[Ha.Nguyen@usdoj.gov](mailto:Ha.Nguyen@usdoj.gov)>; Melissa Haselden <[mhaselden@haseldenfarrow.com](mailto:mhaselden@haseldenfarrow.com)>

**Cc:** Marc Schwartz <[MSchwartz@schwartzassociates.us](mailto:MSchwartz@schwartzassociates.us)>; Christian Schwartz

<cschwartz@schwartzassociates.us>; Harold Lee <hlee@schwartzassociates.us>

**Subject:** [EXTERNAL] Re: InfoW, LLC et al. 22-60020 Deposition and Document Requests

Jayson, Ha and Melissa:

Marc and I discussed the situation the 3 debtors face with still yet uncompleted agreements with Texas Plaintiffs, status conferences next week with Connecticut Plaintiffs and looming deadlines on 3 motions (or is it 1 motion to dismiss) and desire to use resources wisely.

To permit parties to handle the matters carefully, and, to make sure no one is rushed and makes mistake, Marc has suggested to me that the Debtors seek a continuance of a) Answer date of May 20, 2022 until June 17, 2022, b) Exhibit due date of May 25, 2022 until June 22, 2022, c) the hearing date on either 1 or 3 motions to dismiss from May 27 to June 24, 2022 and d) any concomitant extensions on discovery deadlines.

This way the parties can finalize the dismissals with prejudice in Texas and Connecticut timely and accurately, and, then Marc can consider whether he needs to move forward negotiating a new funding agreement or resolve claims outside of bankruptcy. Please let me know if the US Trustee opposes the relief we will be seeking with the Court.

I am working on the Emergency Motion to Continue so let me know your views as soon as you are able.

**Kyung S. Lee**

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**From:** Ruff, Jayson B. (USTP) <[Jayson.B.Ruff@usdoj.gov](mailto:Jayson.B.Ruff@usdoj.gov)>

**Date:** Wednesday, May 18, 2022 at 10:25 AM

**To:** Kyung S. Lee <[klee@kslpllc.com](mailto:klee@kslpllc.com)>

**Cc:** Marc Schwartz <[MSchwartz@schwartzassociates.us](mailto:MSchwartz@schwartzassociates.us)>, Christian Schwartz <[cschwartz@schwartzassociates.us](mailto:cschwartz@schwartzassociates.us)>, Harold Lee <[hlee@schwartzassociates.us](mailto:hlee@schwartzassociates.us)>, Nguyen, Ha (USTP) <[Ha.Nguyen@usdoj.gov](mailto:Ha.Nguyen@usdoj.gov)>, Melissa Haselden <[mhaselden@haseldenfarrow.com](mailto:mhaselden@haseldenfarrow.com)>

**Subject:** InfoW, LLC et al. 22-60020 Deposition and Document Requests

Kyung,

Good morning. Following on our prior communications, attached is a subpoena for production of documents and a notice for the deposition of Marc Schwartz. Please confirm if you will accept service of these on behalf of your client.

If there are any concerns, please let us know.

Kind regards,

***Jayson B. Ruff***

Trial Attorney  
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